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February 21, 2025

FILED ON ECF VIA LETTER

Honorable Robyn F. Tarnofsky
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 703
New York, NY 10007

**Re: *Parker v. Bursor*, 24-cv-245 (JGLC) (RFT)
Letter-Motion for Extension of Time to February 24, 2025 at 9:00 a.m. to
Submit Objections to Exhibits that the Parties Intend to Introduce Through
Live Testimony at the February 26, 2025 Hearing**

Dear Magistrate Judge Tarnofsky:

This Firm, along with Judd Burstein, P.C., represents Defendants Scott Bursor and Bursor & Fisher, P.A. (collectively, "Defendants") in this matter. We respectfully write regarding the orders entered by the Court on February 13, 2025 (ECF289) and February 21, 2025 (ECF 297) (collectively, the "Orders").

Pursuant to the Orders, the parties shall submit their exhibit lists limited to exhibits to be introduced through live testimony with their joint proposed order today and supplemental exhibit lists of exhibits to be introduced through written declarations by Monday, February 24 at 9:00 a.m. Defendants are narrowing their initial exhibit list to those exhibits they will use in connection with live testimony pursuant to the Court's directive. The issue of whether exhibits would be required to be limited only to those to be used in live testimony had not been raised by Plaintiff prior to submission of Plaintiff's letter, and Defendants did not have the opportunity to confer or clarify the intended purpose of the exhibits. Defendants therefore anticipate that this task will not be completed until later today, which would not provide the parties the ability to include objections to specific exhibits remaining in the narrowed list in the joint proposed order.

To avoid delay in the submission of the joint proposed order, and to allow sufficient time to assert objections, Defendants respectfully request the deadline to assert objections to exhibits, and requests for advance rulings regarding exhibits, be extended to Monday, February 24 at 9:00 a.m. to coincide with the submission of the supplemental exhibit lists. With this extension, the parties will still file the joint proposed order today, including the parties' witness lists and exhibit lists limited to exhibits to be introduced through live testimony (without objections and requests for advance ruling).

GIBBONS P.C.

Honorable Robyn F. Tarnofsky, U.S.M.J.
February 21, 2025
Page 2

We thank the Court for its attention and assistance in preparing for the hearing. If Your Honor's chambers has any questions, please contact my office.

Respectfully submitted,

/s/ Christine A. Amalfe

Christine A. Amalfe

cc: All counsel of record (via ECF)